

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

CANADIAN NATIONAL RAILWAY
COMPANY; CERTAIN
UNDERWRITERS AT LLOYD'S
LONDON SUBSCRIBING TO
POLICY NOS. 1814950, 1814958,
1814959, 1814960, 1814961, 1814963,
1814973; AMERICAN
INTERNATIONAL GROUP UK
LIMITED, f/k/a/ AIG EUROPE
LIMITED; AXA XL, f/k/a XL
INSURANCE COMPANY OF
CANADA; ROYAL & SUN
ALLIANCE INSURANCE
COMPANY OF CANADA; STARR
INSURANCE & REINSURANCE
LIMITED; HDI SPECIALTY
INSURANCE COMPANY;
ASSICURAZIONI GENERALI
S.p.A., IRONSHORE INSURANCE
LTD.; and OIL CASUALTY
INSURANCE, LTD., as Subrogees of
Canadian National Railway Company;

Case No. 21-cv-11931

Hon. Linda V. Parker
Magistrate Curtis Ivy, Jr.

Plaintiffs,

v.

THE DAVID J. JOSEPH COMPANY,

Defendant.

DEFENDANT'S RESPONSE TO
ORDER REGARDING REMOVAL (ECF No. 6)

In response to this Court's Order Regarding Removal (ECF No. 6), Defendant David J. Joseph Company states that, to Defendant's knowledge, there were no answers, amended pleadings, responsive pleadings, pending motions, or responses/replies to such motions filed in state court, except for the Amended Complaint which Defendant filed on August 24, 2021 (ECF No. 4). To Defendant's knowledge, the only state court filings other than the Amended Complaint were the Summons and Complaint, which Defendant filed with this Court on August 19, 2021 (ECF No. 1).

Respectfully submitted,

VARNUM LLP

Dated: August 30, 2021

By: /s/ Bradley S. Defoe
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CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2021, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all registered ECF participants listed for this case.

Dated: August 30, 2021

By: /s/ Bradley S. Defoe